

TO: Mr. Joe Boyle, Geologist  
Waste Management Branch  
U.S. Environmental Protection Agency  
230 S. Dearborn Street  
SUBJECT: Chicago, Illinois 60604

FROM: B.P. Shah, Ph.D, Supervisor D.6  
Env. Geology Section  
R.R. Division  
DNR - Mich  
Lansing, Michigan 48909  
OUR JOB NO. Kent Co. Landfill  
DATE OF MEMO 6/30/78

## MESSAGE

Forwarded the information as per your  
request regarding the disposal of story  
chemical waste at Kent County  
Landfill located in Plainfield Twp.

SENDER — DO NOT WRITE BELOW THIS LINE

SIGNED

B.P. Shah

## REPLY

US EPA RECORDS CENTER REGION 5



502540

SIGNED

DATE

ORIGINAL

SENDER — Retain part 2 for your follow-up, send parts 1 and 3 to addressee  
RECIPIENT — Retain part 1 and return part 3

June 12, 1978

Mr. Jeffery L. Dauphin  
Engineering Planning Coordinator  
West Michigan Environmental Action Council  
1324 Lake Drive, S.E.  
Grand Rapids, Michigan 49506

RECEIVED

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WASTE MANAGEMENT BRANCH  
EPA. REGION V

Dear Mr. Dauphin:

Your May 26, 1978 letter has been referred to me for reply.

The concerns you expressed relative to the disposal of the waste resulting from the Story Chemical Company property cleanup are the same concerns I and others expressed before and during the cleanup operation. Our actions were predicated on safely removing and disposing of the waste at Story Chemical Co. in an environmentally sound and legal fashion.

Since you appear to be most concerned with the cleanup as it relates to the Plainfield Township facility I would like to state that no chemical wastes, as such, from the Story cleanup was deposited in the Kent County Landfill. Solid material of a non hazardous nature associated with the cleanup was deposited in that landfill. Solids that were classified as nonhazardous include empty drums, pallets that these drums were stacked on, old tubing, pipes, wood etc. These items were crushed and sent with the sand they were crushed on to an acceptable disposal site for non-hazardous waste.

Persons from the Resource Recovery Division, Michigan Department of Natural Resources, Kent County Health Department and the Kent County Department of Public Works all emphatically declared that no hazardous waste was to be hauled to the Kent County landfill. In order to assure compliance with that requirement and to further insure that all material removed from the Story facility was handled in a safe, legal, environmentally acceptable fashion the following procedures were followed:

1. All drums containing liquids were opened, sampled, analyzed by gas chromatography, infrared spectrophotometry, nuclear magnetic resonance spectrometry, bomb colorimetry and solvent and water solubility tests. In addition these samples were mixed in the lab to determine their compatibility before they were removed from their container.

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2. All liquid material encountered during the cleanup operation was either reclaimed or incinerated at a facility with proper air emissions control apparatus. No liquid of any nature was land filled anywhere as a result of this operation.

Solids and contaminated soils were handled in exactly the same manner as the liquids. They were sampled, mixed, identified, classified as to toxicity and then then sent to a disposal site that was environmentally sound.

No manifest exists for the solid waste deposited in the Kent County landfill or in any of the other landfills for that matter. Manifests for the liquid waste are available and I will be glad to forward copies of those manifests to you if you so desire. I can furnish you with receipts and other items that you requested that will verify my statements. Unfortunately, much of this material has been submitted to bookkeeping for payment at this time. I'll be glad to send a machine copy of all items you request when returned to me if you so desire. The cost of reproduction is 20 cents per page.

The authorization to send materials to various disposal sites is something that gradually developed as a consequence of the dynamic nature of this project. Generally speaking, however, persons from the Department of Natural Resources, Resource Recovery and Air Quality Divisions were contacted relative to potential disposal sites for material from the Story cleanup. Local officials were then contacted for input relative to those sites. I then personally inspected all disposal facilities and when the chemical information became available, selected an appropriate disposal site based on input from all of the above mentioned people and the chemical analysis.

Specifically, relative to the non-hazardous solid waste, no special approval was deemed necessary beyond contacting persons from Resource Recovery and local officials relative to the general acceptability of the site in question.

In conclusion, your statement that it is difficult to believe that the material disposed of in Plainfield Township could have been so carefully sorted and of such uniform consistency to contain only traces of so called "harmless waste" is understandable due to your absence from the site during the cleanup operation. Every drum on that site that could be handled was physically segregated, sampled, classified and disposed of. The wastes that could not be sorted were sampled in situ by literally climbing through the various piles and sampling by color, consistency and other physical characteristics of the waste. None of these wastes were disposed of until they were analyzed and classified. We appreciate your concern over the safe operation of this disposal project and welcome your input. I'll be happy to furnish you with the data that you requested relative to information we used to make our decisions as it becomes available if you so desire.

Mr. Dauphin

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June 12, 1978

If you have any additional questions or requests please contact me at (517) 373-2794. I would be most happy to discuss this matter further with you at your convenience.

Very truly yours,

WATER QUALITY DIVISION

*James C Miller*

James Miller

Water Quality Specialist

Oil and Hazardous Materials Control  
Section

JM:tkr

cc: H. Tanner

W. Tody

F. Kellow ✓

B. Turney

F. Kelley

R. Courchaine

W. Denniston

J. Shauver

Files

RECEIVED  
JUN 14 1978  
RESOURCE RECOVERY DIV

June 12, 1978

TO: William Turney, Chief  
Bureau of Environmental Protection

FROM: Jim Miller, Water Quality Specialist  
Water Quality Division *Jim*

SUBJECT: Alleged Disposal of Hazardous Materials at the Kent County  
Landfill.

Summary

Between April 17 and May 3, 1978 nonhazardous solid material consisting of crushed empty barrels, wooden pallets and slightly contaminated sand from the Story cleanup was deposited in the Kent County Landfill in Plainfield Township.

Persons from the Resource Recovery Division, Kent County Health Department and Kent County Department of Public Works were contacted relative to this matter. No special authorization was sought for this disposal option because the solid material in question was not of a hazardous nature. Special emphasis should be given to the fact that no chemical waste per se was transported to the Kent County landfill as a consequence of this cleanup. All persons contacted relative to this site spoke highly of the protection of groundwater at this facility. All persons contacted further mentioned the nonhazardous permit stipulation. Accordingly, a great deal of care was taken to insure that hazardous or potentially hazardous material resulting from this cleanup was not transported to the Kent County landfill.

In early April 1978, I contacted both Ron Mosier and Len Zulewski relative to the Kent County landfill in Plainfield Township. Those individuals indicated the fill had acceptable geology for nonhazardous solid waste, but both informed me of the permit limitation which forbid disposal of hazardous waste at that site. I was referred to the Health Department who in turn referred me to Mr. Dave Despres of the Kent County Department of Public Works. Mr. Despres also informed me of the nonhazardous requirements and discussed the leachate collection system with me at great length. Despres indicated that the leachate would be discharged to a sanitary sewer for further treatment when and if any contamination from refuse disposal was detected. I visited the site and although I never asked to see the operator's license, the high volume of traffic led me to assume that the operation of this landfill was going on with the full knowledge of all State and local officials. I was impressed with the clean housekeeping employed by the operators and examined a lined pond which I was told contained leachate water. I observed several aquatic insects in this clear water and detected no odor.

After further discussions with Dave Despres the first load of crushed empty barrels was delivered to the site April 17, 1978. Since I was convinced and remained convinced that the solid material in question was not hazardous and presents absolutely no threat to the groundwater beyond that presented by ordinary refuse I saw no need to seek any special authorization.

On April 26, I again contacted Mr. Despres relative to disposing of some incidentally contaminated sand. The sand in question was extremely dry and only trace amounts of organic solvents such as toluene and xylene were detected by gas chromatography. According to Dr. Bedford of our Laboratory that section does not ordinarily attempt to quantify results of this nature but stated off the record that the trace concentrations would most likely be between 1 and 10 milligrams per kilogram or parts per million. As a matter of fact, based on our discussions, Mr. Despres felt that the landfill would be able to use the material for temporary cover. I discussed the situation with Dave Despres and was convinced and remain convinced that this material was not hazardous and presents no threat to the waters of the State beyond that presented by disposal of ordinary refuse. Accordingly, the sand was disposed of at the Kent County Landfill beginning April 27, 1978. No material of any nature was transported to the Kent County Landfill after May 3, 1978.

Please contact me if you are in need of further information relative to this matter.

tkr

cc: D. Dennis  
R. Courchaine  
W. Denniston  
F. Kellow ✓  
L. Zulewski  
Mosier  
Harvey

RECORDS SECTION DM  
JUN 14 1978  
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